December 10, 2013

Ms. Kimberly N. Tisa U.S. Environmental Protection Agency 5 Post Office Square, Suite 100 Mail Code: SORR07-2 Boston, MA 02109-3912

RE: Modification to
Self-Implementing Cleanup and Disposal Plan
80 Coventry Street
Hartford, Connecticut
Eagle Project No. 12-141.10

Dear Ms. Tisa:

Eagle Environmental, Inc. (Eagle) is submitting this proposed modification to the Self-Implementing Cleanup and Disposal Plan (SIP) for the property located at 80 Coventry Street in Hartford, Connecticut as required by Attachment 1, Condition 18 of the PCB Cleanup and Disposal Notification Approval, dated May 23, 2013.

The construction phase of the North End Senior Center (NESC) has started and it has been determined that additional materials will be impacted by the renovations. Two (2) modifications to the approved Plan are being requested.

### 1. Roof Line Window Sashes and Caulks

These materials are associated with a continuous row of windows at the roof line to the NESC. These materials included an interior caulk at the base of the metal window sashes and on a metal flashing underneath, exterior caulk applied under a metal cover plate between sashes and a glazing compound. A section of the windows will have to be removed to properly tie-in the roof to the new addition being added to the existing building. These materials were sampled and determined to contain <50 ppm PCBs through laboratory analysis. These materials have been determined to be from the original construction of the building and therefore meet the definition of Excluded PCB Products under 761.3:

• The material contains PCB as a result of historic use of PCBs in the manufacture prior to US regulation of PCBs.

The material was legally manufactured and used prior to October 1, 1984.

• The current concentration of PCB in the material is not the result of dilution or of leaks or spills in materials with PCB concentrations greater than or equal to fifty (50) PPM.

Although these materials are not regulated by the EPA, the materials that will be impacted by the renovations will be properly removed and disposed of in a state permitted non-hazardous waste landfill that accepts CT regulated waste. It is anticipated that this work will be performed under the Phase I-NESC project.

### 2. Rear Free-Standing Brick Wall

A free standing brick wall at the rear of the building leading to a courtyard will be removed as part of the Phase II-Former Burgdorf Health Center abatement project. There are four (4) expansion joints in the sixty (60) foot long, seven (7) foot high wall and two (2) additional caulk beads at the ends of the walls that contain similar caulk to the rest of the building. Through sampling, caulks identified to contain >50 ppm (identified on attached Source Sample Location Plan SO-1). Brick and mortar at the expansion joints (first course) and at the second brick four (4) inches away (second course) were collected. As with original sampling of the NESC and Former Burgdorf Health Center, PCBs were identified in the first course but the second course contained <1.0 ppm, as identified on attached Substrate Sample Location Plan PCB-2. The concrete foundation under an expansion joint and concrete sidewalk under the caulk bead at the end of the wall did not contain PCBs.

Soil samples were initially collected directly below all expansion joints and determined to contain >1.0 ppm in four (4) locations. Additional discrete samples were collected 2.5 feet away in each direction to determine the end points of contamination. Abatement in Areas #21 and 23 was determined to be 2.5 feet by 5 feet. Abatement in Areas #22 and 24 was determined to be 2.5 feet by 10 feet.

For the modification to the SIP, an additional forty two (42) linear feet of caulk and eighty four (84) linear feet of brick at four (4) inches wide will be removed during Phase II abatement. Four (4) additional verification samples will be collected, two (2) brick and two (2) mortar samples, following brick removal at the rear wall. All procedures as outlined in approved Plan will be followed during brick removal. The Phase II PCB Abatement specifications and associated drawings will be modified to include the caulk, brick and soil removal from the rear wall and additional verification sampling.

We look forward to your approval of this proposed modification. Please do not hesitate to contact me with any questions or comments.

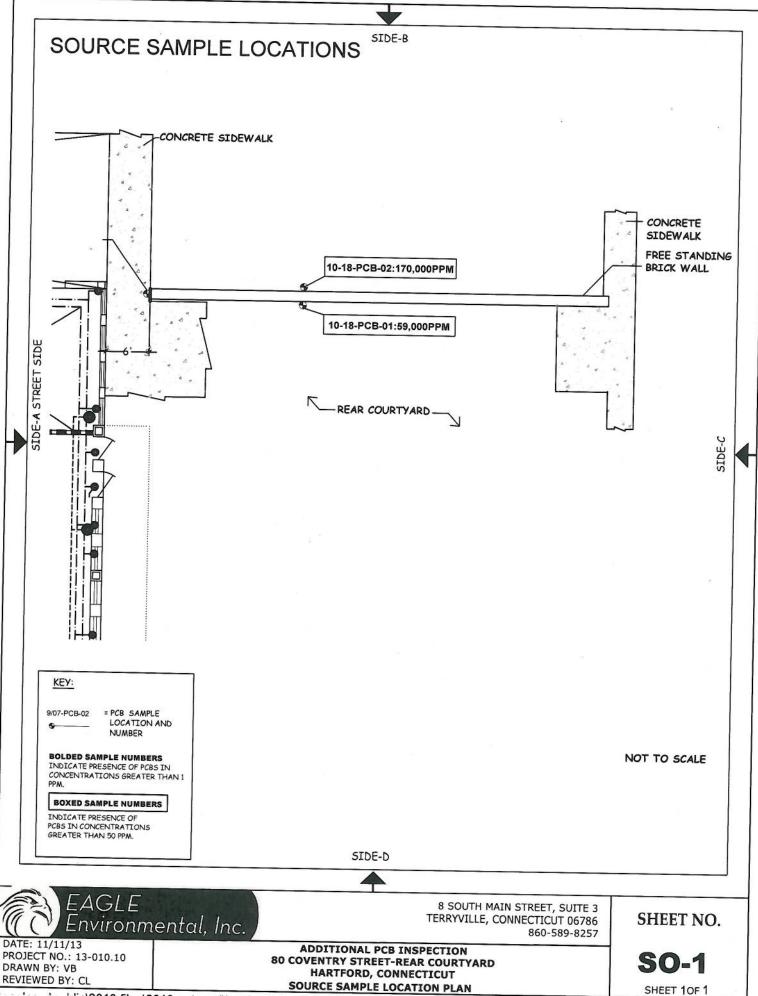
Sincerely, Eagle Environmental, Inc.

Chris Liberti Senior Project Manager

Eagle Environmental, Inc. 8 South Main Street Terryville, Connecticut 06780

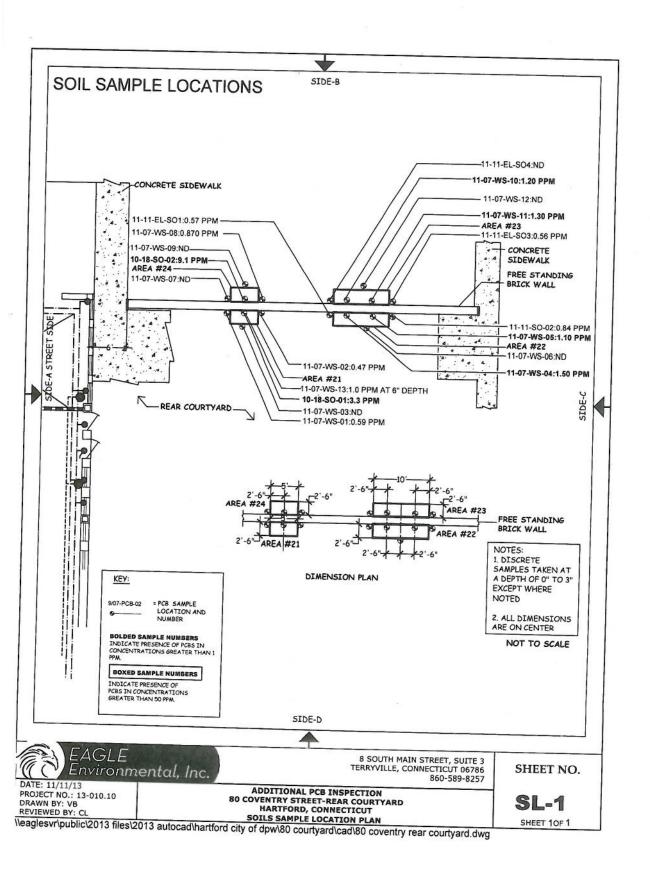
Cc: Mr. Gary Trombly, CT DEEP

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SHEET 1 OF 1



# NOKTH END SENIOR CENTER AND FORMER BURGDORF HEALTH CENTER - REAR COURTYARD 80 COVENTRY STREET HARTFORD, CONNECTICUT

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SAMPLE DESCRIPTION   SAMPLE DESCRIPTION   COURSE 1   COURSE 2   COURSE 3				ND 2.5			line	courtyard		
Caulk in expansion joint   Source   Course   C				18			Side walk at wall below caulk	Rear wall to	11-7-C2S-04	11/7/13
SAMPLE BESCRIPTION   SAMPLE DESCRIPTION   ADALEMENT   SOURCE   COURSE 1   COURSE 3				N.			Concrete foundati9on to wall at	Rear wall to	11-7-C2C-03	11/7/13
Caulk in expansion joint   Source   Course   Course   Course	1254			5.0			facing parking lot	Courtyard		
Courtyard   Caulk in expansion joint   Caulk i				50			Brick at expansion joint -	Rear wall to	10-18-M1-02	10/18/13
SAMPLE   LOCATION   SAMPLE DESCRIPTION   OUANTITY   SOURCE   COURSE 1   COURSE 2   COURSE 3			N CE				Brick at expansion joint -	Rear wall to	11-7-C2M-02	11/7/13
RESULTS IN PPM  Rear wall to courtyard   Caulk in expansion joint   S9,000   S9,000    10-18-PCB-02   Rear wall to courtyard   Caulk in expansion joint   170,000    10-18-B1-01   Rear wall to courtyard   Rear wall to cour	1254			13.0			Brick at expansion joint - facing courtyard	courtyard	10-18-M1-01	10/18/13
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10-18-PCB-01  Rear wall to courtyard  Caulk in expansion joint  Caulk in expansion joint  SAMPLE DESCRIPTION  ADALEMENT  SOURCE   COURSE 1   COURSE 2   COURSE 3    59,000	1021		1		170 000		Caulk in expansion joint	Rear wall to	10-18-PCB-02	10/18/13
LOCATION SAMPLE DESCRIPTION ADALEMENT   RESULTS IN PPM   QUANTITY   SOURCE   COURSE 1   COURSE 2   COURSE 3	1254		-		59,000		Caulk in expansion joint	Rear wall to courtyard	10-18-PCB-01	10/18/13
	FORMS STORY	S IN PPM RSE 2 COURSE	RESULTS		No.	100	SAMPLE DESCRIPTION	LOCATION	SWALLPE #	DATE

### TABLE II PCB CONTAINING SOIL SUMMARY TABLE NORTH END SENIOR CENTER AND FORMER BURGDORF HEALTH CENTER - REAR COURTYARD 80 COVENTRY STREET HARTFORD, CONNECTICUT

			SOXHLET EXTRACTION 8082		TECTED	ND = NONE DETECTED
	ANALYTICAL METHOD	ANALYTIC		KUCY		SPACE MESSAGE
	1.30		Soil to 3" depth	Area #23 - 2.5' east of expansion joint at wall	11-7-WS-11	11/7/13
	1.20		Soil to 3" depth	Area #23 - 2.5' west of expansion joint at wall	11-7-WS-10	11/7/13
		ND	Soil to 3" depth	Area #24 - 2.5' north of expansion ioint at wall	11-7-WS-09	11/7/13
		0.87	Soil to 3" depth	Area #24 - 2.5' east of expansion joint at wall	11-7-WS-08	11/7/13
		ND	Soil to 3" depth	Area #24 - 2.5' west of expansion joint at wall	11-7-WS-07	11/7/13
		ND	Soil to 3" depth	Area #22 - 2.5' south of expansion joint at wall	11-7-WS-06	11/7/13
	1.10		Soil to 3" depth	Area #22 - 2.5' east of expansion joint at wall	11-7-WS-05	11/7/13
	1.50		Soil to 3" depth	Area #22 - 2.5' west of expansion joint at wall	11-7-WS-04	11/7/13
		ND	Soil to 3" depth	Area #21 - 2.5' south of expansion joint at wall	11-7-WS-03	11/7/13
		0.47	Soil to 3" depth	Area #21 - 2.5' east of expansion joint at wall	11-7-WS-02	11/7/13
		0.59	Soil to 3" depth	Area #21 - 2.5' west of expansion joint at wall	11-7-WS-01	11/7/13
	9.10		Soil to 3" depth	Area #24 - at base of wall under expansion joint	10-18-SO-02	10/18/13
	3.30		Soil to 3" depth	Area #21 - at base of wall under expansion joint	10-18-SO-01	10/18/13
		現代の	DESCRETE SOIL SAMPLES	DESCR		
CORRECTION RESULT >50 PPM	READING LIMIT >1 PPM - <50	ND-≤(PPM)	DESCRIPTION	SAMPLE LOCATION	SAMPLE#	DATE
		The second name of the second na	the name of Concession of the Owner, where the Owner, which the Owner, where the Owner, where the Owner, which the Owner, where the Owner, where the Owner, which the Owner, whi	The second secon		ALL AND DE VALUE OF THE PARTY AND

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## TABLE II PCB CONTAINING SOIL SUMMARY TABLE NORTH END SENIOR CENTER AND FORMER BURGDORF HEALTH CENTER - REAR COURTYARD 80 COVENTRY STREET HARTFORD, CONNECTICUT

ANALYTICAL METHOD	100	SOXHLET EXTRACTION 8082	19	TECTED	ND = NONE DETECTED
		The second secon	KEY		The Party of the P
	MN	Soil to 3" depth	joint at wall	11-11-EL-SO-04	11/11/13
	0.56	Soil to 3" depth	joint at wall	11-11-EL-SO-03	11/11/13
	0.84	Soil to 3" depth	ioint at wall	11-11-EL-SO-02	11/11/13
	0.57	Soil to 3" depth	ioint at wall	11-11-EL-SO-01	
	36	COMPOSITED SOIL SAMPLES	Area #22 - 5 West of ormanie	11 11 11 11 11 11	11/11/12
	1.00	Soil to 6" depth	expansion joint	11-7-449-13	
	ND	Soil to 3" depth	ioint at wall Area #21 - at base of wall under	11 7 WE 12	11/7/13
The state of the s	1000	8	Area #23 - 2.5' north of expansion	11-7-WS-12	11/7/13
READING LIMIT	RESULTN	DESCRIPTION			
CORRECTED DECIT TOTAL		SAMPLE	SAMPLE LOCATION	SAMPLE#	DATE